

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KIMIESHA HILL, et al., on behalf of themselves  
and all others similarly situated, )  
Plaintiffs, ) Case No. CV-21-00097-SLP  
v. )  
TOWN OF VALLEY BROOK, et al, )  
Defendants. )

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD**

Pursuant to LCvR 83.5, Izabella Babchinetskaya seeks leave of this Court to withdraw as counsel *pro hac vice* for Plaintiffs Kimiesha Hill, Jason Garnett, and Kiara McCorkle (“Plaintiffs”) in the above-captioned matter. In support of this Motion, counsel states as follows:

1. Plaintiffs are currently being represented in this matter by Jason Leckerman and Lisa Swaminathan of Ballard Spahr LLP, Arthur Ago and Tianna Mays of the Lawyers’ Committee for Civil Rights Under Law, and Woodrow K. Glass and Jonathan M. Irwin of Ward & Glass, LLP.
2. Ms. Babchinetskaya is leaving the employment of Ballard Spahr LLP, effective July 28, 2023.
3. Ms. Babchinetskaya has provided notice of her departure to Plaintiffs and all counsel for Plaintiffs.

4. Ms. Babchinetskaya has provided notice of her departure to all counsel for Defendants.

5. Plaintiffs will continue to be represented by Ballard Spahr LLP, the Lawyers' Committee for Civil Rights Under Law, and Ward & Glass LLP.

6. The withdrawal of Ms. Babchinetskaya will not cause prejudice or delay to Plaintiffs or this proceeding.

WHEREFORE, Izabella Babchinetskaya respectfully requests that the Court grant leave for her to withdraw as counsel of record for Plaintiffs in this matter.

Dated: July 27, 2023

Respectfully submitted,

*/s/ Izabella Babchinetskaya*  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of July, 2023, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for Filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

*/s/ Izabella Babchinetskaya*  
Izabella Babchinetskaya